

EXHIBIT 3

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

RowVaughn Wells, Individually and as)	
Administratrix of the Estate of Tyre Deandre)	
Nichols, Deceased,)	
)	
)	
Plaintiff,)	
)	
v.)	CASE NO. 2:23-CV-02224
)	JURY DEMAND
The City of Memphis, Tennessee; Chief Cerelyn)	
Davis; Emmitt Martin III;)	
Demetrius Haley; Justin Smith;)	
Desmond Mills, Jr.; Tadarrius Bean;)	
Preston Hemphill; Robert Long;)	
JaMichael Sandridge; Michelle Whitaker;)	
DeWayne Smith,)	
)	
Defendants.)	

**DEFENDANT THE CITY OF MEMPHIS’ REVISED RESPONSE TO
PLAINTIFF’S REQUEST FOR PRODUCTION NO. 133**

Defendant the City of Memphis (“the City”), pursuant to Rule 34 of the Federal Rules of Civil Procedure, revises its response to Plaintiff’s Request for Production No. 133 as follows:

This revised response is limited to Plaintiff’s Request for Production No. 133, which was included in Plaintiff’s Sixth Set of Requests for Production. As agreed upon by Plaintiff and the City, the City will provide its full revised responses to the Sixth Set of Requests for Production by January 21, 2025. The City reserves the right to amend or supplement this response as additional information becomes available through discovery and/or expert opinion or otherwise.

All references to the Production Inventory shall be read to mean the most recently updated Production Inventory served upon all counsel.

RESPONSE

133. All documents the City has provided or produced to the DOJ since January 7, 2023 relating to or in connection with the DOJ Pattern or Practice Investigation.

RESPONSE: The City is producing documents responsive to this Request. The responsive documents are identified by Bates Number in the Production Inventory

The City objects to producing certain law enforcement databases that were produced to the DOJ on the grounds of relevancy and burdensomeness. The databases contain highly sensitive information about citizens, police officers, and ongoing investigations that are irrelevant to this litigation, and which would require a disproportionate amount of cost and effort to segregate out that information. The City is withholding access to those databases it provided to the DOJ.

Respectfully submitted,

**BAKER, DONELSON, BEARMAN,
CALDWELL & BERKOWITZ, P.C.**

s/ Jennie Silk

Bruce McMullen (#18126)
Jennie Vee Silk (#35319)
Freeman B. Foster (#23265)
165 Madison Avenue, Suite 2000
Memphis, Tennessee 38103
Telephone: (901) 526-2000
bmcullen@bakerdonelson.com
jsilk@bakerdonelson.com
ffoster@bakerdonelson.com

*Attorneys for Defendant City of Memphis,
Chief Cerelyn Davis in her Official Capacity,
and Dewayne Smith as Agent of the City of
Memphis*

CERTIFICATE OF SERVICE

I hereby certify that on January 15, 2025, a copy of the foregoing document was served on all counsel of record and the Guardian Ad Litem via e-mail:

s/ Jennie Silk

Jennie Silk